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IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : Chapter 13

Janel P. Clark : Case No. 23-12751-AMC

Debtor(s)

## ANSWER TO MOTION OF RELIEF FROM THE AUTOMATIC STAY OF MIDFIRST BANK AND CERTIFICATE OF SERVICE

- 1. Admitted.
- 2. Admitted.
- 3. Admitted.
- 4. Admitted.
- 5. Admitted.
- 6. Denied. Debtor requests that a witness appear to prove that she is actually owes three (3) months. Debtor does authorize Midfirst Bank to communicate directly with the Debtor as she has requested.
- 7. Denied.
- 8. Denied.
- 9. Denied.
- 10. No response required.

WHEREFORE, Debtor respectfully requests this Honorable Court deny Movant's Motion for Relief from Automatic Stay.

/s/ David M. Offen
David M. Offen Esquire
Attorney for Debtor

Dated: October 14, 2024

A copy of this Answer is being served on DENISE ELIZABETH CARLON, Esquire and the Chapter 13 Trustee.

/s/ David M. Offen
David M. Offen Esquire
Attorney for Debtor

Dated: October 14, 2024